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October 10, 2024

BY ECF & E-Mail

The Honorable Ann M. Donnelly
United States District Court Judge
Eastern District of New York
225 Cadman Plaza
Brooklyn, New York 11201

**Re: *United States v. Cory Martin*, 20 Cr. 549 (AMD)
Sentencing Memorandum¹**

Dear Judge Donnelly,

We represent Cory Martin in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A. On March 4, 2024, Cory was convicted at trial of a five-count superseding indictment, which charged him with murder for hire, in violation of 18 U.S.C. § 1958(a), murder for hire conspiracy, in violation of 18 U.S.C. § 1958(a), wire fraud conspiracy, in violation of 18 U.S.C. § 1349, aggravated identity theft in violation of 18 U.S.C. § 1028A, and fraudulent use of identification, in violation of 18 U.S.C. § 1028(a)(7). He objects to the entire description of the offense conduct contained in the presentence report. PSR ¶¶ 9-28.

Cory’s humanity should have a role in this proceeding, even if it cannot be considered in the Court’s sentencing calculus. Cory is a 37-year old man from Brooklyn, New York. He was the only child at home with his parents. Though he had paternal and maternal siblings, they were much older and had already moved out. He deeply loved his father and role model, Cecil Martin. Cory found comfort, peace and motivation with him. His mother Elaine inflicted constant verbal, physical and emotional abuse on Cory, telling him things like, “I wish you would die.” Exhibit A at 4. Cory fought for her love every day she was alive, despite her horrific treatment of him.

¹ Attached as Exhibit “A” is a report by mitigation specialist, Mr. Conrad Lindo.

By the second grade, Cory was placed in a “gifted program” because of his high academic performance. He also played in a Pop Warner Youth Football league for six years from 1995 until 2001. During his middle school years, he struggled socially and was a victim of bullying—including a violent attack—sometimes because of his academic and extracurricular success. He remembers being an “easy target.” He was determined to continue his schooling. At fourteen years old, he transferred to Bishop Ford High School, a Catholic private school in Park Slope. After a year there, he transferred on an academic scholarship to another Catholic private school, Bishop Laughlin High School in Fort Greene.

Though both schools were safer and had better programming than his prior schools, he felt as though he did not fit in. The hypervigilance and paranoia, along with the trauma he experienced daily from his mother at home, resulted in him evolving into a hardened version of himself. He spent more time on the streets. He became friends with people engaged in criminal activity. He stopped attending school regularly. And his family began to struggle financially, leading to his transfer to Canarsie High School in 2004, which at the time, was identified as one of the most dangerous schools in the city. Cory was exposed to more violence, drugs, gang activity and death than he ever had before.

When Cory was seven years old, his father was diagnosed with prostate cancer and required a strict regimen of medical treatment and monitoring. At thirteen years old, his mother was diagnosed with breast cancer. In 2012, when Cory was 25 years old, Cecil passed away. Less than three years later in 2013, his mother died. Cory spent years caring for both of his parents as a young adult. When they were both gone, Cory was left with nothing. He had little desire to build a life for himself. He was crushed, unsure how to move on and forward, despite how much promise and potential he always had.

If Cory’s father were alive today, Cory reflected, he would give his son this piece of advice: “Don’t lose yourself in [prison].” Cory is a thoughtful man, who despite suffering devastating losses and despite facing a mandatory life sentence, has hope—hope that his life, even if spent inside a prison cell for the foreseeable future, or perhaps forever, has meaning and purpose. He desires and has already begun making a positive impact on younger fellow inmates in need of direction, and as Cory improves and grows himself, we have no doubt that that impact on others will be felt for years to come.

One in seven people in United States state and federal prisons is serving a life sentence—over 203,000 people.² The number of people serving life without the possibility of release, is higher than ever before, a 66% increase since 2003.³ More than two-thirds of those serving life sentences are people of color.⁴ Debate around the utility of long prison sentences often ends with the mention of violent crime, even though empirical data tells us that life imprisonment does not keep our communities safe. Imprisonment beyond 20 years is a predominantly American

² Ashley Nellis, Ph.D., “No End in Sight: America’s Enduring Reliance on Life Imprisonment,” The Sentencing Project, 2021.

³ *Id.*

⁴ *Id.*

phenomenon. The continued expansion of this country's zeal for ever-harsher punishment is driven by fear and a desire for retribution. Decades of experience, data and social science support shorter sentences and restorative approaches. Life in prison is a slow, torturous death. It serves no practical or moral purpose. To believe that there are people wholly incapable of rehabilitation and undeserving of a second chance at life, no matter what they have done, is a devastating feature of the American criminal legal system. And it is simply wrong.

Cory has a beautiful family in Virginia, who loves him dearly. He is especially close to his two older sisters and niece. They have kept in touch with him during the pendency of this case and hope that he can be housed near them so they can visit him in person. Maintaining relationships like these will be important to Cory's well-being. We, the defense team, hope to hold onto our relationship with Cory as well, to follow his growth and see the man he will become.

Respectfully submitted,

/s/

Anthony Cecutti, Esq.
Kestine M. Thiele, Esq.

Exhibit A

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October 1, 2024

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United States of America v. Cory Martin

Dear Counselors:

The following is a report on behalf of your client Cory Martin. The report is based on an investigation of Mr. Martin's social history. Interviews were conducted with Mr. Martin in person and by phone. Interviews by phone were also conducted with Lynise Martin (paternal half-sister), and Whitney Martin (niece). A family meeting with members of the defense team was also held in Virigina, and Lynise Martin and Mr. Martin's other paternal half-sister, Monique Martin, were present. In addition to interviews, reviews were done of the Presentence Report (PSR) submitted by the U.S. Probation Officer, the Sentencing Recommendation from the U.S. Department of Probation, medical records from New York Presbyterian Hospital, Queens, New York, and Kings County Hospital, Brooklyn, New York, and an educational record from New York City Department of Education.

Introduction

Cory Martin is a 37-year-old African American male in custody at the Essex County Correctional Facility, Newark, New Jersey. On March 4, 2024, he was found guilty by jury trial of Counts 1, 2, 3, 4, 5 of a Superseding Indictment. He now awaits sentencing. He understands that this report is based on an investigation of his social history. He was cooperative and respectful during interviews for this report. As recalled by Cory, he showed promise early in school and was put in a gifted program. However, a history of unresolved adverse impacts also influenced his developmental years, with resultant harm to psychological, social and behavioral functioning. The foundation of these adverse experiences is the relationship with his parents, especially with an abusive mother from whom he felt no love and no acceptance.

Family Background

Cory Martin was born on June 18, 1987, to the marital union of Cecil Martin and Elaine Martin (nee Williams) in the Bronx, New York. He is the only child born to the union of his parents. Both parents are deceased due to cancer. Cory was in his 20s when his parents died, but he recalled that they were first diagnosed when he was a child. He said his father died at 76 years old of prostate cancer, and his mother died at age 68 of breast cancer.

Cory reported that he has three maternal half-siblings, Brenton Taylor (around age 50), Steven Taylor (in his 40s) and Delroy Taylor (deceased). He said his maternal half-siblings are from his mother's first marriage, and since his childhood they have rejected him as a member of the family. He has three paternal half siblings, Lynise Martin (age 50), Monique Martin (age 48), and Trent Martin (age 40), and they reside in Virginia. Lynise works as a nurse, Monique works in customer service, and Trent's employment is unknown. Cory indicates that he remembers his father taking him to visit his paternal half-siblings when he was a child. He is closer to his paternal half-sisters than to his paternal half-brother, and he expressed that he wished he had grown up with or around them, as he believes his life would have turned out better.

Cory was raised in a two-parent home. He had a strong childhood bond with his father, but his mother was the dominant parent in the home. He expressed that his mother's moods,

abusive words and actions counteracted any sense of wellbeing his bond with his father should have engendered. He elaborated that the lack of a loving relationship with his mother made his childhood extremely unhappy.

Elaine Martin, Cory's mother, was born on July 20, 1947, on the Caribbean Island of Jamaica. She was born to Gwendolyn Williams, whom Cory said died in or around 1998 in Jamaica. He believes his grandmother died of breast cancer, which is the same sickness that would result in his mother's death in 2017.

Cory indicated he was not sure of the identity of his mother's father. He did not have information as to when his mother migrated to the United States and under what circumstance. However, like many Jamaicans, her reason for migrating to the US could have been to pursue better socioeconomic opportunities. As recalled by Cory, his mother worked as a nurse in New York City throughout his childhood.

Cory reported that his mother's first husband was a man with the last name of Taylor. He said her union with Taylor produced three children before the marriage ended. Cory indicated some confusion as to whether his mother had started seeing his father before her marriage to Taylor ended. His impression is that when his mother got married to his father, Cecil Martin, it caused resentment among her children by Taylor. He feels that when his mother was pregnant with him, her older children became resentful of him and his father. According to Cory, his mother's oldest and favorite child, Brenton Taylor, "didn't like my father and had something personal against me."

Cory reported that his father, Cecil, was born on February 20, 1936, in New York City, of Barbadian immigrant parents. Cecil's parents are deceased. Cory said his paternal grandparents died before he was born, and so he knows very little about them. He said he did not know the cause of his paternal grandmother's death but he heard that his paternal grandfather died of a stroke. He indicated wishing he had the opportunity to know more about his paternal grandparents before they died. He reiterated that maybe if he had gotten to spend more time around his paternal family, the course of his life would have been better.

Cory reported that his parents did not have a happy marriage. He noted the difference in his parents' temperaments, suggesting that they were incompatible like oil and water. He indicated that though his parents stayed together throughout his childhood, the friction between them was obvious. He expressed that the conflict between his parents would spill over into the disparate way in which he was treated. Dad took pride in being a father and genuinely cared about him, according to Cory. Of his mother, Cory said she was able to appear pleasant in public but she was distant and uncaring at home. His father embraced him, but his mother merely tolerated him at best when she was not abusing him. He indicated that his father seemed to deal with the conflict at home by drinking. He could not quantify how regularly his father drank. There was a sense that his mother did not love his father and may have resented him for giving her a child (Cory) she never wanted. Cory also indicated that he suspected that his mother, who was about 11 years younger than his father, was seeing other men.

Childhood Development

Cory has no awareness of whether his birth was free of complications. He assumes he had a healthy birth and reached his developmental milestones on time. According to Cory, he thinks the only concern was his weight because he was a bit chubby in childhood. He said he lost weight as he got older. He could not refer to any family member who could give details about his birth and infancy. He added that there was no one else in the home other than his parents, as he did not grow up with any of his half-siblings.

From his early formative years, Cory's relationship with his mother was defined by him trying to win her love and by her abusing him. The abuse was physical and emotional. He recalls his mother hitting him whenever she felt like doing so. Oftentimes his mother's words were more hurtful than the beatings. "My mother was a mean woman," Cory recalled.

Cory's earliest memory is of his mother telling him that she wished he were dead. He remembers his mother saying repeatedly, "Me never want you...I wish you would die!"

Cory said there were times his mother referred to him as a “bad mistake.” Cory said that at 3 years old, he could not understand why his mother hated him and wanted him to die.

A reprieve for Cory was when his mother took him to Jamaica to see his maternal grandmother. He recalled that he was about 3 years old when his mother took him to see his maternal grandmother for the first time. He said other visits would follow up until he was about 11 years old. He indicated that when his mother took him on such trips, she was on her best behavior and appeared to be a caring parent. However, such appearances by his mother never negated the dread he felt when it was time to return with her to the United States.

When asked what he remembered about his maternal grandmother, Cory responded that she loved him and treated him like he was a child. A fond memory is of his grandmother making homemade ice cream for him. Another fond memory is of his grandmother showing him off to neighbors and letting them know he was her grandson. He indicated that if he had a choice, he would have remained with his grandmother in Jamaica rather than return to live with his mother.

At home, Cory looked to his father to protect him from the acrimony of his mother. His father did not beat him or verbally abuse him. He liked going out with his father, and the places his father took him did not have to be special because the important feeling was relief. A treat for Cory was when his father took him to Virginia to spend time with his paternal half-siblings and other paternal relatives.

Cory’s paternal half-sisters, Lynise Martin and Monique Martin, confirmed his childhood visits. They recalled that when Cory visited with their father, he was happy to be among them and he was quite congenial. They did not have intimate knowledge of what Cory experienced at home, as they lived in Virginia and lacked opportunity for close interaction with his mother. Furthermore, even when Cory visited as an older child, he just wanted to enjoy being around them rather than to talk about negative things. They noted that even in adult life, Cory did not talk about things that might be bothering him.

Lynise's daughter, Whitney, who is in her 30s, said that over the years she and Cory communicated often. Whitney acknowledged that Cory is her uncle but, given that they are so close in age, they related more like brother and sister. According to Whitney, at some point Cory complained to her about the way his mother treated him in childhood.

Whitney recalled Cory telling her that he and his mother were not close. She added that he complained about his mother saying things to hurt him. Whitney as well as her mother, Lynise, noted that Cory never complained about his father. Lynise expressed that Cory was their father's favorite child because he was the last child and young enough to still be in the home. She indicated that it is understandable for Cory to see his father as the parent with whom he felt safe.

From early in his childhood, Cory's need for safety was heightened by recurring exposure to domestic violence. Cory recalls that his mother was aggressive and would instigate fights with his father. He noted that there were instances when arguments escalated into fights. He recalled his mother had a habit of disrespecting his father, whose calmer demeanor seemed to make her feel emboldened to fight him.

Cory felt traumatized by the domestic violence. His answers indicate, too, that the trauma imposed on him his earliest lessons about man-woman relationships. Particularly, that not only will his mother abuse him in childhood but also, as he becomes older like his father and form relationships, other women will harm him if he seems defenseless.

At 7 years old, Cory's trust in his father's ability to protect him began to wane. It was at that age that Cory started worrying about his father's health. His father had been diagnosed with prostate cancer and required a regimen of medical treatment and monitoring. Initially, Cory did not know his father's diagnosis, but he could see that something was not right with his father. It was apparent to Cory that his father's role was retreating due to age, sickness, and retirement or disability preventing him from working. Cory indicated that the decline he started witnessing in his father was traumatizing, as it felt to Cory that his own life was dependent on the health of his father.

As ill-health forced his father into the background, Cory felt increasingly exposed to the vagaries of his mother. His mother was the primary income earner for the family and implicitly, if not explicitly, she was the authority in the home. His mother's authority meant for Cory a persistent threat of abuse that hurt him emotionally and physically. He recalled that even when he was showing his mother that he wanted to make her proud, she would make him feel rejected. As such, when he started school he would look for affirmation from others and hope that it would make his mother come to love him.

According to Cory, by the 2nd grade in school he was placed in a "gifted program" because of his high academic performance. Cory indicated that he was proud of being in a gifted program at a time he was trying to weather his mother's denigration of him at home. He indicated that one consolation is that his mother, despite her negative attitude towards him, had no objection to the school system affording him a good education.

Another means of outside affirmation Cory latched onto was playing youth (Pop Warner) football. Cory played youth football for six years beginning in 1995, when he was 8 years old. He reported that the youth football team was called the Kings Bay Football Team, located in Brooklyn, New York. Kings Bay Football has an online presence, which shows a program for children ages 6 to 14. Cory reported that the team played against other youth teams in New York. When asked if he remained in touch with any coach or player of the Kings Bay team, Cory reported that he was unable to maintain contact with anyone from the team because there were changes every year and his affiliation with the program ended over 20 years ago. He indicated that despite his lack of contact with former coaches, it was the affirmation he received while playing that was important to him.

For Cory, the need for outside affirmation took on greater importance as a way to manage the anxiety and resentment he felt at home. As he transitioned to early adolescence, the need for coping mechanisms to protect himself internally prevailed upon him. When he turned 13 years old, he was met with the news that his mother had breast cancer. This was in addition to the fact that his father's history of prostate cancer remained worrisome. Cory indicated that the thought of losing two parents was frightening but he never felt able

to talk about it. As such, he felt a pressing need to demonstrate he could take care of himself whether through a physical sport like football, being academically gifted, and/or interest in a self-defense sport like boxing.

Cory recalled that by age 13, the threats to his wellbeing were also coming from peers in the community. He indicated that he not only had to use his smarts to get to and from school, but also had to defend himself physically against kids who preyed on gifted students. Cory recalled that he was attacked at times while coming home from school, and he never felt he could look to his parents to protect him.

It was confounding for Cory that despite his sympathy for his mother when she was diagnosed, she continued to act abusively towards him. A shock for Cory was when his mother inveigled his maternal half-brother, Brenton Taylor, to come to the house to beat him up. At the time, according to Cory, he was 15 years old and Brenton was a 34-year-old adult. Cory recalls having to defend himself as best he could when Brenton attacked him.

To Cory, his mother siccing his adult brother on him was another means of showing that she could abuse him whenever she wanted. That episode also impressed upon Cory that his father, whom he believed loved him, was not able to help him and that he had to protect himself.

Cory reported that after 14 years old, the affirmation he was getting from playing youth football ended. And he was barely holding on to whatever affirmation he received from being a gifted student. He indicated that by age 15 there was not enough avenues open to him to distract from the anxiety and resentment building up inside.

He indicated that his involvement in youth football and the gifted program had begun to mirror the conflicts he experienced at home. Relatedly, it appeared that whatever early satisfaction he gained from those involvements was having unforeseen repercussions. These repercussions included head injuries, getting bullied, difficulty forming sustainable and trusty relationships, depression, and anxiety about his future.

Head Injuries / Concussions

Cory reported that he started having head injuries at 8 years old, when he began playing youth football. This was a case of kids playing tackle football, Cory stated. He indicated that though they were small kids, they were trained to tackle hard and the forceful contact resulted in head and bodily injuries. He said that he played youth football up until age 14. He suffered multiple hits while practicing and during games. He said there were instances of momentary loss of consciousness. He said he never complained about the hits, but there were instances after games when he continued to experience headaches, dizziness, blurry vision, and worry about his fate.

When asked about medical attention for the kids who played, Cory said the youth football team did not have medical staff at practices or games. There was no real attention paid to issues of concussion back in those days, Cory stated. He said it was part of the football culture, even at the youth level, to demonstrate toughness to keep one's place on the team.

Cory indicated further that he had to learn to keep his emotions hidden because to show hurt or fear would make him lose the respect of his coaches and teammates. That early socializing experience made Cory feel he could not trust to confide in anyone about his feelings, because he would be seen as weak and then victimized. In a sense, such models of social discourse seemed like an extension of his experience at home, where he felt no choice but to endure his emotional injuries quietly as he faced his abusive mother.

Bullied and Forced to Fight

By 12 to 13 years old, Cory was struggling with another social challenge, which was the threat of school peers bullying him. Cory recalled that although he was proud to be in a gifted program, other kids perceived students like him as easy targets. A vivid memory for Cory is of peers picking on him inside and outside of the middle school he attended. Cory recalled that the middle school was in the Bushwick area of Brooklyn, and he always had to watch out for the bullies. He said the threat was amplified by the fact that he did not live in Bushwick, and so the only reason he was attending school there was because of the gifted program.

Despite the bullying, Cory was determined to complete his education. According to Cory, he was able to transfer, through a scholarship, to a private high school at age 14. This was a Catholic school, the Bishop Ford High School, located in the Park Slope area of Brooklyn. After a year at that high school, he transferred on scholarship to another Catholic private school, Bishop Laughlin High School, in the Fort Greene Area of Brooklyn.

Cory indicated that the two private schools were safer than the public schools he had attended previously. He liked that the schools had discipline and made students wear uniforms. However, whenever he left the private school grounds to go home, he faced risks of assault from public school students.

A vivid life-threatening instance was when a group of Hispanic kids attacked him in a park as he tried to navigate his way home from school. Cory indicated that the bullying he suffered forced him to toughen up his persona, and to react aggressively to minimize the risk of repeated victimization. He indicated that social interactions were colored by a mix of hypervigilance, paranoia, and fear of betrayal and harm.

It was difficult for Cory to manage the feeling that even those close to him could pose a threat. As such, he learned to be guarded to protect himself. A constant emotional quandary was that if he could not even trust his mother to do right by him, then whom could he trust?

Transfer to Dangerous Public School / Meets Co-Defendant

A severe turn for Cory was having to leave private school to re-enroll in the public school system. This occurred in 2004, at age 16, when financial and other difficulties at home threatened to derail his education. Cory recalled that he lost his place at Bishop Laughlin High School because his parents could no longer afford the fees necessary to supplement the scholarship. This was a period when both parents were struggling with medical expenses for their respective illnesses, and there was a drop off in the family income. While Cory understood that his parents could no longer pay for his education, he was terribly disappointed at what was another blow to his wellbeing.

Cory's disappointment intensified when the public school to which he was transferred was Canarsie High School. At Canarsie High School, in Brooklyn, he encountered a hostile environment that provoked traumatic stress responses. For instance, hypervigilance, being paranoid, and fight or flight impulses seemed necessary for survival. He indicated that the hostility at the school was also evident in the off-campus environment. He recalled an incident when a group of other students attacked him just after he left the school campus. He said the group kicked and punched him to his head and body. He recalled that he received treatment at Kings County Hospital for his bodily injuries.

Cory recalled that violent interactions among students, and between students and teachers, were common at Canarsie High School. He recalled that it was normal to see police officers stationed at the school to keep the peace.

A report in the New York Times (dated 12/24/2003; available online) shows that in 2003 the then Mayor of New York City, Michael Bloomberg, announced plans to increase police presence in dangerous schools. On January 6, 2004, the New York Post identified Canarsie High School as one of the dangerous schools to which Mayor Bloomberg was planning to deploy police officers. This was six months prior to Cory's admission to Canarsie High School on July 2, 2004.

Cory's official discharge from Canarsie High school was on November 1, 2005, five months after his admission. He recalls, however, that he had stopped attending the school prior to his official discharge date, due to safety concerns.

Cory reported that he met his co-defendant, Adelle Anderson, while they were both students of Canarsie High School. He recalled that Adelle, even as a student, appeared much more street wise than him. Cory cited, for instance, that when he met Adelle her demeanor made him believe she was sexually experienced and engaging in sex work. He suggested that though he was attracted to her while they were students, she was not the type of girl he imagined a future with.

He indicated further that by the time he met Adelle, even the prospect of romantic relationships with most of the girls he met evoked suspicion and hypervigilance. A concern was that such relationships might provide moments of intimate gratification, but also likely devolve into a cycle of exploitation, emotional and physical abuse, and betrayal. Accordingly, even if he was attracted to Adelle, he felt a need to be constantly on guard to protect himself.

Cory expressed that he did not pursue a long-term relationship with Adelle until a succession of lows in his mid to late 20s. He elaborated that these lows included the death of his father, the death of his mother, a failed marriage, and overwhelming feelings of grief, depression, and isolation.

Death of Father

A devastating blow to Cory was the death of his father on July 27, 2012. Cory was 25 years old when his father died after a lengthy struggle with prostate cancer. Prior to the loss, Cory had spent much of his time fretting about his father's health. As reported, this fretting started at 7 years old when he first learned of his father's cancer diagnosis. His worry intensified in the weeks prior to his father's death. According to Cory, in those final weeks he spent much of his time caring for his ill father.

Added to Cory's emotions was the notion that he had disappointed his dying father. He saw his father as the only person whose love he never doubted. However, his efforts to live up to the expectations of his father fell miserably short.

One setback was Cory's inability to complete his education and to pursue a career. According to Cory, after he dropped out of high school he enrolled in Kingsborough Community College to obtain a GED diploma and to do college courses. Cory recalled his interest in pursuing an associate degree at Kingsborough Community College. He said he was thinking of doing the college's nursing program. However, he failed to complete the academic program at Kingsborough Community College due to financial difficulties. He said he had to drop out of college to support himself.

Cory reported that at about 19 or 20 years old, he started working as a security guard. He said his employment was with Securitas, which assigned him to various businesses in New York City. He recalled that depression and anxiety, especially at a time he felt his father was dying, overwhelmed him and he was unable to maintain steady employment.

Cory indicated that to cope with the stress he turned to distractions such as hanging out on the street. He recalled that his hanging out on the street coincided with increased reliance on marijuana and alcohol to help him through the day. According to Cory, an embarrassing episode was when his father happened to see him on the corner hanging out with drug users and dealers.

Cory reported that another embarrassing episode was when, at age 21, he was arrested for driving under the influence of alcohol. He indicated that such an episode not only threatened to damage his ability to maintain employment, but also could have taken him from his father at a time his father needed him.

According to Cory, by around age 24 he was dedicated to taking care of his father. He indicated that up to the very last days of his father's life, he stayed as close to him as possible. This entailed helping his father with medical appointments and running errands to procure necessities. Cory indicated that it was difficult to watch the last days of his father's life, and he was ill-prepared emotionally to cope with the loss.

Cory recalled that he was even more prone to depression after his father died. He indicated that he had suicidal thoughts and acted accordingly. According to Cory, he was at a point where he no longer cared what happened to him, and it was like he had a death wish. "whatever happens to me happens," Cory recalled feeling. He recalled drinking heavily and smoking marijuana daily, which signified that he had become unmoored and it was anybody's guess where his life would end.

Marriage and Fatherhood

Three months after his father's passing, Cory learned that he was an expectant father. The expected child was from his union with Jade Marshal, whom Cory had met when they

were students at Bishop Laughlin High School in 2002. Cory indicated that though he dated Jade after they left high school, her pregnancy was unplanned. After he learned that she was pregnant, he felt it was a sign that the right thing to do was for them to get married. He learned of her pregnancy in October 2012, and they got married in April 2013. Their first child, Ava Martin, was born on July 9, 2013.

Cory expressed that he married Jade at an unstable stage of his life, while he was still in shock and grief over the loss of his father. He indicated that because he was not emotionally stable, his marriage to Jade was not well thought out. He and Jade resided at her mother's home in Brooklyn, New York. Also residing in the home was Jade's stepfather. He said Jade, like him, was born in the United States to parents of Caribbean heritage. However, it soon dawned on him that a feeling of shared heritage was not enough to make a marriage successful.

According to Cory, his marriage to Jade broke apart after the birth of their second child, Brandon Martin, on July 10, 2014. He noted that Jade's attitude towards him turned negative after Brandon's birth. Upon reflection, according to Cory, it is possible that Jade suffered from postpartum depression, but he could not say for certain because she did not seek medical attention.

It was worrisome for Cory, too, that Jade was resentful whenever he spent time with his terminally ill mother. Cory recalled that around the time he got married to Jade, his mother's health had deteriorated significantly due to cancer. He felt it was best to split his time between staying with Jade in Brooklyn and staying with his mother in Queens. He recalled that Jade would argue with him about the amount time he was staying with his mother.

Further complicating his marriage, according to Cory, was Jade objecting when he wanted his mother and another family member to see the baby. He recalled that Jade argued with him because he was taking the baby to his mother. A concern for Cory was that Jade not only wanted him to stop spending time with his mother, but also that she would use the children to manipulate him.

Cory reported that he and Jade separated in late 2014, a little over a year after they got married. He had been living in Jade's family home, and so he was the one forced to leave. He then went back to live with his mother full time. He expressed that the separation from Jade also meant he was separated from his children, as Jade made it difficult for him to have access to them.

Death of Mother

Cory's mother died on February 1, 2015, approximately two and a half years after his father died. Cory indicated also that the death of his mother shortly after the breakup of his marriage hit him hard. Prior to his mother's death, he was the one living with her and taking care of her. Cory related that he was at home with his mother right up until the time of her death.

As recalled by Cory, even in the last days of his mother's life he hungered for her love and blessing. He was hopeful that he and his mother would heal their relationship. A dilemma for Cory was that though he remained the dutiful son in the dying days of his mother, she continued to deny him the acknowledgment he needed as her son.

Cory recalled that he once overheard his mother telling someone on the phone that Cory was the only one there to care for her. It struck Cory, however, that his mother still could not speak to him directly in a way that conveyed love and acceptance. Cory said he attended his mother's funeral but he never had the benefit of healing. In recalling his feelings, Cory expressed that he never received closure.

Relationship with Co-defendant Adelle Anderson

Following the death of his mother, Cory's ability to recover was impeded by the reality of his failed marriage. Cory recalled that Jade filed for divorce and retained custody of his children in 2016. He was 29 years old and felt like he had no place to go and no one to turn to. At around that time, according to Cory, he became closer to Adelle Anderson and they opted to live together. Their union produced one child, Alysia Martin (age 6) who resides with Adelle.

Cory indicated that Adelle was involved in sex work before they started living together, and she had an influence on choices he made. He recalled that Adelle and the victim, Brandy Odom, were friends and Adelle introduced him to Brandy. He indicated that Adelle also wanted Brandy to stay with them, and he agreed. His responses indicate that he felt like a broken man at the time, and thus susceptible to any arrangement that made him feel he still had a chance in life.

Mental Health History

Cory reported that he was never afforded mental health services including clinical evaluations, diagnosis, and treatment and therapy. However, his history indicates a range of significant psychosocial stressors, beginning in his early formative years, which put him at risk for mental/emotional health issues extending into adult life. His answers indicate susceptibility to depression, anxiety, prolonged grief, suicidal thoughts, traumatic stress symptoms such as hypervigilance and flight or fight impulses, substance abuse, and social-emotional dysregulation. The fact that he was not afforded mental health interventions heightened the risks for poor outcomes. A concern for Cory also was a childhood history of head trauma, which left him with symptoms such as headaches, confusion, dizziness, and blurred or lapsed memory. He was never medically examined in childhood for head trauma and concussions. The first time he was medically examined for a concussion was in February 2018, at age 30, when he fell down a flight of stairs and hit his head.

Substance Use History

Cory reported a history of marijuana and alcohol use. He indicated that his use of marijuana started in adolescence and continued up until the time of his arrest for the instant offense. He indicated that his alcohol use also started in adolescence. While admitting to alcohol and marijuana use, Cory indicated that his use of both substances escalated since 2006 as he tried to cope with drastic changes in his life.

Physical Health History

Cory does not report any current medical ailments or injuries for which he is being treated. He indicated that he does have headaches, which he attributes to the football-related head injuries/concussions of his childhood and two incidents in adulthood. Reportedly, he suffered a concussion in a motor vehicle accident in his 20s but never sought or received treatment. Records from New York Presbyterian Hospital, in Queens, corroborate that he presented to the hospital on February 5, 2018, because of a head injury and concussion. As indicated by the hospital records, he presented two days after he had fallen down a flight of stairs. According to the hospital notes, he complained of head injury, headaches, loss of consciousness, dizziness, vomiting and nausea resulting from the fall. He also reported a small amount of blood came from his nose when he fell.

Upon presenting at New York Presbyterian hospital, Cory was diagnosed with Post-Concussion Syndrome. He underwent a CT-Scan of his head, with the results showing “No intracranial hemorrhage, mass effect or midline shift.” He was administered Ibuprofen 600mg 1 tab every 6 hours for 7 days as needed, and Acetaminophen 650mg one dose oral, once. He was discharged the same day (2/5/2018) with instructions about post-concussion syndrome, taking his medication (Ibuprofen), following up with his primary care doctor in 5 days, as well as avoiding activities that cause pain, dizziness and nausea, and any further blows to the head.

Records from Kings County Hospital, Brooklyn, indicate that on January 26, 2010, Cory was treated for eye pain. He was discharged the same day but returned to Kings County Hospital on January 29 and May 2, 2010 with more eye complaints. His eye complaints resulted in a diagnosis of conjunctivitis, and he was treated and discharged on each occasion. Cory also recalls being treated at Kings County Hospital when he was a teenager and sustained injuries due to an assault while he was going home from school. Records from Kings County Hospital did not include any information pertaining to the assault or subsequent treatment. Of note is that hospitals in New York City can destroy patient records six years after the patient’s discharge.

Education History

As reported by Cory, he attended New York City public schools as well as two Catholic high schools. He recalled that while at PS 251 in Brooklyn, he was placed in a gifted program. He recalled attending public schools in a gifted program up until middle school, IS 383, in Brooklyn, after which he was transferred to private Catholic high schools. The private high schools he attended were Bishop Ford High School followed by Bishop Laughlin High School, both in Brooklyn. He recalled obtaining a scholarship to attend each of the private high schools but his parents had to cover some of the educational expenses. As reported, he was transferred back to the public school system when his parents could no longer afford to pay their share of the educational expenses at the private schools. Upon his transfer back to public school, he was admitted to Canarsie High School, in Brooklyn, on July 2, 2004. The reputation of Canarsie High School was that of a low performing and dangerous school. Cory dropped out of the school shortly after he started attending there, and he was officially discharged in November 2005. He reportedly obtained a GED (General Educational Development) diploma in 2006, while he was enrolled at Kingsborough Community College. He reportedly started to pursue college courses at Kingsborough Community College, but dropped out in 2006 due to financial difficulties and a need to earn an income to support himself.

Employment History

Cory reported that he worked as a security guard for Securitas in Manhattan from around 2006 to 2008. He recalled that he was assigned to various business locations in Manhattan to do security work. Cory indicated that his employment history has been limited since 2008, consisting of a few off-the-books and temporary jobs.

Criminal Record

On March 4, 2024, Cory was found guilty by jury trial of Counts 1, 2, 3, 4, 5 of a Superseding Indictment. He has been in custody since his arrest by federal agents on November 4, 2020. He is currently at Essex County Correctional Facility, where he awaits sentencing. Based on information in the Presentence Report (“PSR”), Cory has one prior arrest, which was on January 18, 2009. On that date, according to the PSR, New York City police

officers arrested him for Operating a Vehicle with .08% of 1% Alcohol or More in the Blood – 1st Offense (Class U Misdemeanor). The PSR indicates that on March 12, 2009, the case resulted in a disposition of Conditional Discharge; Alcohol Abuse Program; \$1,000 Fine. During his interview for this report, Cory acknowledged his prior arrest and did not seek to make excuses or to minimize it.

Sentencing

Cory understands that his conviction exposes him to a sentencing guidelines range of life imprisonment. He also understands that when he presents for sentencing, the Court will have information from this report about his life. He is hopeful that despite the mandatory punishment he faces, information presented to the Court on his behalf will be afforded some consideration.

Post-Arrest Adjustment

Based on information received as of the date of this report, Cory is inclined to participate in rehabilitative and self-improvement programs while incarcerated. Cory reported that he has participated in programs such as financial courses and classes on substance abuse. During his interviews for this report, Cory has shown improvement in his ability to address certain adverse events associated with his childhood, and which have had a lingering effect on his mental and social-emotional functioning. He is open to mental health services to help him address stressors appropriately and to cope with incarceration after sentencing. A strength for Cory has been contacts with his paternal half-siblings and niece. These family members have been residing in Virginia since his childhood. He has maintained contact with them via phone during his time in custody.

One of Cory's sisters Lynise Martin and her daughter Whitney confirmed that they have maintained contact via phone. The family members have asked that Cory be allowed to serve his sentence at an institution in Virginia, as they would like to be able to be close enough to visit him. Cory is agreeable to the wishes of his family members.

Mitigation

Cory is aware that information in this report will be part of the record at sentencing. His social history provides some context about who Cory Martin is and indicates a number of mitigating factors. These include, but are not limited to, the following.

- **Traumatic Childhood Relationship with Mother:** The toxic parenting of Cory's mother throughout his childhood still affects him. His mother's adversarial relationship with him left a range of psychological and social-emotional wounds. In his 20s and into his 30s, the effects were becoming clearer, with tragic consequences for himself (e.g. suicidal thoughts/death wish; substance abuse) as well as for his relationship with others. Cory struggled to form healthy social and romantic and domestic attachments, free from the destructive feelings associated with his mother's harmful relationship with him.
- **Untreated Depression, Anxiety, Suicidal Ideation, Substance Abuse, Etc.:** Cory's answers indicate a susceptibility to mental/emotional health issues beginning in childhood and extending into adult life. His answers indicate that such susceptibility was impairing to executive functioning (e.g. decision making, judgment, emotional regulation) and to his ability to carry out normal daily activities such as employment and social and domestic interactions.
- **Childhood Victim of Physical & Emotional Abuse and Neglect:** The federal government's Dept. of Health and Human Services, through its Administration for Children & Families/ Children's Bureau, publishes an online Factsheet on the "Long term consequences of child abuse and neglect." According to the Factsheet, dated April 2019, childhood victims of abuse and neglect are put at increased risk for physical, psychological, and behavioral consequences extending into adult life. Noted is that the behavioral consequences can include participation in unhealthy sexual practices such as "sex engaged for money." Other behavioral consequences include higher risk for juvenile delinquency leading to adult criminal conduct.

- **History of Head Injuries & Concussions Since 8 Years Old:** Hospital records from February 2018 corroborate that he sought treatment, after he suffered trauma to his head and a concussion after falling down the stairs. An information sheet, provided the hospital about his injury included a list of symptoms that can “last from weeks to months.” These symptoms may include among others: Depression, Headaches, Memory Difficulties, Dizziness, Difficulty with Concentration, Difficulty Sleeping or Staying Asleep, Double Vision or Blurry vision. Cory indicates experiencing some or all of such symptoms subsequent to concussions in adulthood, as well as childhood.
- **Childhood Exposure to Domestic Violence:** Cory’s witnessing of the fights and arguments between his parents not only disturbed him emotionally, but also imposed his earliest lessons of conflict resolution in man-woman relationships.
- **Bullied by Peers for Being Academically Gifted:** The federal government website, stopbullying.gov, cites increased risk for bullied children to experience negative outcomes. These negative outcomes can include impact mental health, by making a child susceptible to depression and anxiety, and decreased academic performance. Another risk factor for Cory’s development, as he tried to survive the bullying, was the pressure to assume violence as a defense mechanism against actual or perceived threats to his physical and mental wellbeing.
- **Traumatic Events Triggered Negative Turn Culminating in Instant Offense:** From late adolescence to his late 20s, Cory’s ability to transition and adjust to adult life was marred by events experienced as devastating and life-altering. His emotionally dysregulated state, at such a transitional phase of development, can lead to poor decision-making.
- **Death of Father and Mother From Cancer 2 ½ Years Apart:** The emotional impact of the deaths of his parents so close in time to each other continues to be a struggle

for Cory. He hopes to receive mental health services and other programming while serving his sentence that will aid in his recovery.

- **Breakup of Marriage and Losing Access to Children:** This coincided with the period of losing his mother to cancer. This was a period of extreme vulnerability to whatever props of survival that appeared accessible.
- **Post -Arrest Adjustment is Favorable:** Cory's overall adjustment to incarceration has been positive.
- **Ability and Motivation to Improve while Incarcerated:** This is demonstrated by Cory's participation in different programs/courses and clean disciplinary record while in custody at Essex County Correctional Facility.
- **Access to Mental Health Services Would Help with Sentence Adjustment:** Given the psychosocial factors presented in this report, a setting where Cory can have safe access to therapeutic services and stability would support adjustment to prolonged incarceration.
- **Post-Arrest Support from Paternal Family Members a Positive Influence:** Cory believes his life would have turned out differently if he had been raised closer to his much older paternal half-sisters in Virginia. Their support since his arrest has helped with his adjustment to custody. After sentencing, the need for such support becomes even more pressing. As such, it is desirable that he be placed in an institution in Virginia, where the sense of family closeness can help to support appropriate transition to a long-term sentence.

Conclusion

Cory has an understanding of the sentence he now faces, given his conviction in the instant case. Cory showed early promise in school, and he was designated a gifted student. But

the sabotaging of that promise also started early, given certain circumstances beyond his control. These include being raised by an abusive, unloving, resentful mother, and by a father too overcome with health frailties to protect him. Leading up to the instant offense, Cory endured years of built up depression, anxiety, traumatic stress, mistrust/suspicion of those around him, perceptions of betrayal and harm, etc. His ability for normal daily activities was impaired by such mental/social-emotional susceptibility. His interviews for this report have been helpful to opening his eyes to the possibility of benefiting from mental health services, which should support healing and adjustment to his sentence. At Essex County Correctional Facility, he has demonstrated motivation for self-improvement programs when these are made available to him. Also important to his time in custody is the support of paternal family members who have resided in Virginia since his childhood. There is a sense on Cory's part that he would have been better off if he had been raised with or around his paternal half-sisters. They are much older than him, and so they relate to him more like loving, well-meaning aunts rather than siblings. A recommendation is that he serves his sentence in a facility in Virginia, where closer contact with these family members can have a strong positive impact on his adjustment to incarceration and his motivation for rehabilitation.

Respectfully Submitted

/s/ Conrad Lindo

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